

Wiley, Rein & Fielding

ORIGINAL

1776 K Street, N.W.
Washington, D.C. 20006
(202) 719-7000

Lawrence W. Secrest III
(202) 719-7074
lsecrest@wrf.com

Fax: (202) 719-7049
www.wrf.com

July 28, 2000

RECEIVED

JUL 28 2000

Ms. Magalie Romaan Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
12th Street Lobby, TW-A325
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: In the Matter of Availability of INTELSAT Space Segment Capacity to
Users and Service Providers Seeking to Access INTELSAT Directly,
IB Docket No. 00-91

Dear Ms. Salas:

Enclosed for filing in the above-referenced matter are the original affidavits, copies of which were originally filed in support of our July 25, 2000 Response.

Please date stamp the enclosed duplicate and return it for our files.

Sincerely,

Lawrence Secrest III

Lawrence W. Secrest, III

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20554

JUL 28 2000

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OFFICE OF THE SECRETARY

In the Matter of)
)
Availability of INTELSAT) MD Docket No. 00-91
Space Segment Capacity to)
Users and Service Providers)
Seeking to Access)
INTELSAT Directly)
)
To: The Commission

AFFIDAVIT OF JOHN H. MATTINGLY

1. My name is John H. Mattingly. I am the President of COMSAT Satellite Services. I have held this position since September of 1997.

2. I have read COMSAT's Response Comments in the above-styled proceeding, and I believe them to be true and accurate.

3. During June, 1999, COMSAT and WorldCom were discussing a possible voluntary agreement on the issues in this proceeding. Substantial progress was being made, but at the critical moment WorldCom cut off discussions for reasons they said were purely political.

4. COMSAT and WorldCom have been able to agree on mutually advantageous deals when commercial negotiations are conducted by business people.



John H. Mattingly

STATE OF Maryland
COUNTY OF Montgomery ss:

Subscribed and sworn to before me this 25th day of July, 2000.

Derrick Johnson
Notary Public

My Commission Expires:

**DERRICK JOHNSON
NOTARY PUBLIC STATE OF MARYLAND
MY COMMISSION EXPIRES DEC. 1, 2003**



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Washington D.C. 20554**

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To: The Commission		

AFFIDAVIT OF ROBERT TWINING

1. My name is Robert Twining. I am the Vice President of Sales & Marketing for COMSAT World Systems. I have held this position since October 1992.
2. I have read COMSAT's Response Comments in the above-styled proceeding, and I believe them to be true and accurate.
3. COMSAT has placed no GR or FRR reservations for any of the new incremental capacity that INTELSAT will be deploying in the next three years.
4. COMSAT has no right to any Bulk Capacity on any satellite in the planned INTELSAT IX and INTELSAT X series, other than the right to carry over certain current leases to replacement satellites.
5. As of Monday, July 24, 2000, no FRRs and only two GR's placed by COMSAT without an underlying customer commitment will be in effect.
6. Of COMSAT's fifty-six Bulk Capacity leases that have come up for renewal since direct access was implemented, it has relinquished thirty and renewed only twenty-six.

7. WorldCom's charge that COMSAT used WorldCom's direct access submissions to INTELSAT to obtain INTELSAT lease capacity for Malaysia and Brazil is incorrect. COMSAT did not secure either of these leases.

8. INTELSAT's current deployment plan calls for an overall increase in INTELSAT capacity of 45% over the next three years.

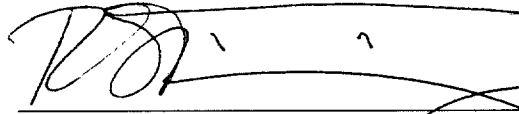
9. Since 1995, COMSAT has on fewer than five occasions reserved capacity by placing a GR without having first obtained an underlying commitment from a customer.

10. With the lone exception of a single transponder that COMSAT has leased for its own business development purposes, COMSAT only holds two GRs for a small amount of capacity on the INTELSAT system that do not have an underlying COMSAT commitment associated with them.

11. During recent negotiations with Worldcom executives, they made it clear that Worldcom would accept an agreement with COMSAT for renewing circuits (for longer terms at lower prices) without the necessity for a larger volume traffic agreement being concluded between COMSAT and Worldcom.

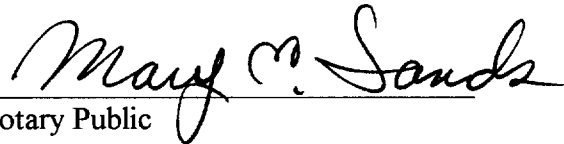
12. COMSAT has abandoned the practice it occasionally followed in prior years of placing FRR reservations in advance of firm customer requirements to guarantee the availability of desirable capacity to potential U.S. users.

13. When COMSAT's contracts with INTELSAT expire, COMSAT does not routinely hold the capacity in question without an identified customer requirement. For example, since the advent of direct access, COMSAT has relinquished approximately as many Bulk Capacity leases as it has retained – and it has retained capacity only where there is an identified customer need for the capacity.


Robert Twining

STATE OF Maryland
COUNTY OF Montgomery ss:

Subscribed and sworn to before me this 25 day of July, 2000.


Notary Public

My Commission Expires:

Mary E. Sands, Notary Public
Montgomery County
State of Maryland
My Commission Expires March 01, 2003

**Before the
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Washington D.C. 20554**

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To: The Commission		

AFFIDAVIT OF SUSAN P. MILLER

1. My name is Susan Miller. I am the Vice President of Engineering and Operations for COMSAT World Systems. I have held this position since June of 1998.

2. I have read COMSAT's Response Comments in the above-styled proceeding, and I believe them to be true and accurate.

3. COMSAT service requirements that could not be fulfilled by INTELSAT amounted to approximately thirty-five 36 MHz equivalent transponders.

4. The capacity COMSAT currently has under contract with INTELSAT has been substantially improved by COMSAT through its own efforts over many years.

5. In the "regrooming" process, COMSAT relocates isolated available capacity to frequencies adjacent to other such capacity, in order to aggregate the available capacity into larger "blocks" more useful to customers with high bandwidth requirements.

6. Since the period beginning January 1998 COMSAT has only once experienced an upswing of 10% or greater in its INTELSAT space segment capacity commitments over any one

quarter. Based on customer demand, quarterly changes are in a continual state of flux. Since January 1998, those variations have been as shown in Exhibit 1.

Susan P. Miller
Susan P. Miller

STATE OF Maryland
COUNTY OF Montgomery ss:

Subscribed and sworn to before me this 25 day of July, 2000.

Mary E. Sands
Notary Public

My Commission Expires:

Mary E. Sands, Notary Public
Montgomery County
State of Maryland
My Commission Expires March 01, 2003

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AFFIDAVIT OF THOMAS COLLINS

1. My name is Thomas Collins. I am the Vice President and General Manager of COMSAT World Systems. I have held this position since October 1999.

2. I have read COMSAT's Response Comments in the above-styled proceeding, and I believe them to be true and accurate.

3. It has been COMSAT's practice neither to reserve INTELSAT space segment nor exercise any "automatic FRRs" without first securing a firm commitment from a specific customer. Only on a few occasions has COMSAT reserved capacity without a firm customer commitment. As of today, all but about 2.5% of reserved capacity has been sold.

4. COMSAT has not entered into "rolling" extensions of its INTELSAT circuits for the past five years. Although COMSAT had previously entered into such extensions for individual circuits, it did so only in order to secure lower, long-term rates from INTELSAT.

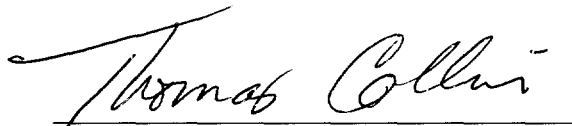
5. At a meeting on March 30, 2000, to discuss a COMSAT service proposal, MCI WorldCom stated that in submitting their direct access orders to INTELSAT, they had to "test the process" by submitting numerous orders for unavailable frequencies. Mr. Paul Bates, Mr. George

Clutter of MCI WorldCom, Mr. Robert Twining, Mr. Ted Boll, Mr. Howard Polsky, Mr. Keith Fagan, and myself of COMSAT attended the meeting.

6. COMSAT has never used knowledge of customers' direct access submissions to INTELSAT to "exploit or interfere with" these customers' direct access plans. During the first three months of direct access—the only time during which COMSAT had access to this information—COMSAT maintained a policy pursuant to a contractual agreement with INTELSAT that prohibited COMSAT's sales personnel from having access to this information.


7. To my knowledge, COMSAT's policy referred to in ¶ 6 was *never* breached. On a few occasions, a direct access user—WorldCom—ignored the express instruction set forth in COMSAT's tariff and erroneously sent its direct access submission to INTELSAT directly to COMSAT's sales and operations personnel—as opposed to COMSAT's Signatory office, as the tariff directed.

8. Since 1996, COMSAT has only once experienced an upswing of 10% or greater in its INTELSAT space segment capacity commitments during any one business quarter. That single upswing of greater than 10%, which occurred in the fourth quarter of 1999, was driven entirely by customer demand, and particularly for Internet capacity.


Thomas Collins

STATE OF Maryland
COUNTY OF Prince George's ss:

Subscribed and sworn to before me this 24th day of July, 2000.


Notary Public

My Commission Expires:

My Commission Expires
May 4, 2003